

United States District Court
Southern District of Texas
FILED

AO 91 (Rev. 02/09) Criminal Complaint

Felony

UNITED STATES DISTRICT COURT

AUG - 8 2019

for the
Southern District of Texas

David J. Bradley, Clerk of Court

United States of America
v.Case No. *B-19-MJ-800*Eli RAMIREZ-Rios*Defendant*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of August 7, 2019 in the county of Cameron in the Southern District of
Texas, the defendant violated 18 U.S.C. § 554 and 371,

an offense described as follows:

Knowingly conspired to export or send from the United States, or attempt to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for the exportation contrary to any law or regulation of the United States, to wit: five (5) Palmetto State Armory AR-10 rifles and five (5) AR magazines.

This criminal complaint is based on these facts:

On August 7, 2019, Eli RAMIREZ-Rios was departing the U.S. through the Brownsville and Matamoros (B&M) Port of Entry in Brownsville, TX, driving a silver Buick Enclave bearing Mexican license plates: A98THF3. The Enclave was referred to outbound inspection. RAMIREZ gave Customs and Border Protection Officers (CBPOs) a negative declaration for weapons, ammunition and money. During the outbound inspection of the vehicle, five (5) Palmetto State Armory AR-10 rifles and five (5) AR magazines were discovered concealed under the hood of the Enclave in the firewall section of the vehicle.


☐ Continued on the attached sheet.*Complainant's signature*

Christopher Roberts, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

8/8/2019*Judge's signature*City and state: Brownsville, Texas

Ignacio Torteya III, U.S. Magistrate Judge

Printed name and title